

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

BONITA L. DeCHANT, aka

DEFENDANTS

LAW OFFICES OF JAMES A. WEST, P.C., ET AL.

(b) County of Residence of First Listed Plaintiff Cuyahoga, OH
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

(c) Attorney's (Firm Name, Address, and Telephone Number)

HARVEY S. MORRISON [#0015230], 75 Public Square - Suite 1425, Cleveland, OH 44113 216/687-0343

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15USCA Sec. 1692

Brief description of cause:

FAIR DEBT COLLECTION PRACTICES ACT VIOLATIONS

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

UNSPECIFIED

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

09/11/2008

SIGNATURE OF ATTORNEY OF RECORD

S/ HARVEY S. MORRISON

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO

I. Civil Categories: (Please check one category only).

1. ☒ General Civil
 2. ☐ Administrative Review/Social Security
 3. ☐ Habeas Corpus Death Penalty

*If under Title 28, §2255, name the SENTENCING JUDGE: _____

CASE NUMBER: _____

II. **RELATED OR REFILED CASES.** See LR 3.1 which provides in pertinent part: "If an action is filed or removed to this Court and assigned to a District Judge after which it is discontinued, dismissed or remanded to a State court, and subsequently refiled, it shall be assigned to the same Judge who received the initial case assignment without regard for the place of holding court in which the case was refiled. Counsel or a party without counsel shall be responsible for bringing such cases to the attention of the Court by responding to the questions included on the Civil Cover Sheet."

This action is ☐ **RELATED** to another **PENDING** civil case. This action is ☐ **REFILED** pursuant to LR 3.1.

If applicable, please indicate on page 1 in section VIII, the name of the Judge and case number.

III. In accordance with Local Civil Rule 3.8, actions involving counties in the Eastern Division shall be filed at any of the divisional offices therein. Actions involving counties in the Western Division shall be filed at the Toledo office. For the purpose of determining the proper division, and for statistical reasons, the following information is requested.

ANSWER ONE PARAGRAPH ONLY. ANSWER PARAGRAPHS 1 THRU 3 IN ORDER. UPON FINDING WHICH PARAGRAPH APPLIES TO YOUR CASE, ANSWER IT AND STOP.

(1) **Resident defendant.** If the defendant resides in a county within this district, please set forth the name of such county

COUNTY:

Corporation For the purpose of answering the above, a corporation is deemed to be a resident of that county in which it has its principal place of business in that district.

(2) **Non-Resident defendant.** If no defendant is a resident of a county in this district, please set forth the county wherein the cause of action arose or the event complained of occurred.

COUNTY: Cuyahoga

(3) **Other Cases.** If no defendant is a resident of this district, or if the defendant is a corporation not having a principle place of business within the district, and the cause of action arose or the event complained of occurred outside this district, please set forth the county of the plaintiff's residence.

COUNTY:

IV. The Counties in the Northern District of Ohio are divided into divisions as shown below. After the county is determined in Section III, please check the appropriate division.

EASTERN DIVISION



**AKRON
CLEVELAND**

(Counties: Carroll, Holmes, Portage, Stark, Summit, Tuscarawas and Wayne)



(Counties: Ashland, Ashtabula, Crawford, Cuyahoga, Geauga, Lake,
Lorain, Medina and Richland)



YOUNGSTOWN

(Counties: Columbiana, Mahoning and Trumbull)

WESTERN DIVISION



TOLEDO

(Counties: Allen, Auglaize, Defiance, Erie, Fulton, Hancock, Hardin, Henry, Huron, Lucas, Marion, Mercer, Ottawa, Paulding, Putnam, Sandusky, Seneca VanWert, Williams, Wood and Wyandot)

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

BONITA L. DeCHANT aka BONNIE DeCHANT

Plaintiff

v.

LAW OFFICES OF JAMES A. WEST, P.C., et al.

Defendant

Civil Action No.

Summons in a Civil Action

To: *(Defendant's name and address)*

LAW OFFICES OF JAMES A. WEST, P.C.
6380 Rogerdale Road - Suite 130
Houston, TX 77072-1624

A lawsuit has been filed against you.

Within 28 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, whose name and address are:

HARVEY S. MORRISON, ESQ.
75 Public Square - Suite 1425
Cleveland, OH 44113-2070

If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

GERI M. SMITH

Name of clerk of court

Date: _____

Deputy clerk's signature

Proof of Service

I declare under penalty of perjury that I served the summons and complaint in this case on _____,
by:

- (1) personally delivering a copy of each to the individual at this place, _____;
_____; or
- (2) leaving a copy of each at the individual's dwelling or usual place of abode with _____
who resides there and is of suitable age and discretion; or
- (3) delivering a copy of each to an agent authorized by appointment or by law to receive it whose name is
_____; or
- (4) returning the summons unexecuted to the court clerk on _____; or
- (5) other (*specify*) _____

_____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

Date: _____

Server's signature

Printed name and title

Server's address

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

BONITA L. DeCHANT aka BONNIE DeCHANT

Plaintiff

v.

LAW OFFICES OF JAMES A. WEST, P.C., et al.

Defendant

Civil Action No.

Summons in a Civil Action

To: *(Defendant's name and address)*

MICHAEL J. YOUNG
c/o LAW OFFICES OF JAMES A. WEST, P.C.
6380 Rogerdale Road - Suite 130
Houston, TX 77072-1624

A lawsuit has been filed against you.

Within ____ days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, whose name and address are:

HARVEY S. MORRISON, ESQ.
75 Public Square - Suite 1425
Cleveland, OH 44113-2070

If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

GERI M. SMITH

Name of clerk of court

Date: _____

Deputy clerk's signature

Proof of Service

I declare under penalty of perjury that I served the summons and complaint in this case on _____,
by:

- (1) personally delivering a copy of each to the individual at this place, _____;
_____; or
- (2) leaving a copy of each at the individual's dwelling or usual place of abode with _____
who resides there and is of suitable age and discretion; or
- (3) delivering a copy of each to an agent authorized by appointment or by law to receive it whose name is
_____; or
- (4) returning the summons unexecuted to the court clerk on _____; or
- (5) other (*specify*) _____

_____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

Date: _____

Server's signature

Printed name and title

Server's address

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**BONITA L. DeCHANT
aka BONNIE DeCHANT
159 Tamarack Drive
Berea, OH 44017**

Plaintiff

v.

**LAW OFFICES OF JAMES A. WEST, P.C.
6380 Rogerdale Road – Suite 130
Houston, TX 77072-1624**

**MICHAEL J. YOUNG
c/o LAW OFFICES OF JAMES A. WEST, P.C.:
6380 Rogerdale Road – Suite 130
Houston, TX 77072-1624**

Defendants

CASE NO.

JUDGE:

COMPLAINT

**JURY DEMAND
ENDORSED HEREON**

I. INTRODUCTION

1. This is an action for actual and statutory damages arising out of Defendants' violations of the Fair Debt Collection Practices Act, codified as 15 U.S.C. §1692, et seq. (hereinafter referred to as "FDCPA") prohibiting debt collectors from engaging in abusive, deceptive and unfair practices.

II. JURISDICTION

2. Jurisdiction of this Court arises under 15 U.S.C. §1692(d) and 28 U.S.C. §1337.

3. Plaintiff, an adult female, at all times pertinent hereto was a resident of Cuyahoga County, Ohio.

4. Defendants, at all times pertinent hereto, were a law firm and lawyer, respectively, maintaining offices and practicing law in Houston, Texas.

5. Defendants, as "debt collectors", elected to do business and enter Cuyahoga County, Ohio by writing a letter to Plaintiff, an alleged debtor, a copy of which is annexed hereto as "EXHIBIT A", and incorporated by reference as if fully rewritten. By such action, Defendants established "minimum contacts" in Cuyahoga County, Ohio.

III. THE PARTIES

6. Plaintiff is an adult female at all times pertinent residing at 159 Tamarack Drive, Berea, Cuyahoga County, Ohio.

7. Defendant, LAW OFFICES OF JAMES A. WEST, P.C. (hereinafter referred to as "WEST PC") is believed to be a professional corporation engaged in the practice of law and maintaining offices in Houston, Texas.

8. Defendant, MICHAEL J. YOUNG (hereinafter referred to as "YOUNG") is a lawyer licensed by the State Bar of Texas to practice law and is associated with Defendant WEST PC, and at all times pertinent hereto was acting in the course and scope of his employment as a lawyer maintaining offices in Houston, Texas.

IV. FACTUAL ALLEGATIONS

9. Defendants, WEST PC and YOUNG were retained as legal counsel for Capital One Bank for the express purposes of attempting to collect a debt allegedly owed by Plaintiff to CAPITAL ONE BANK.

10. Defendants, jointly and severally, are debt collectors as so defined by the FDCPA.

11. On or about July 9, 2008, Defendants wrote the letter to Plaintiff, annexed hereto as EXHIBIT A, seeking payment of the alleged debt. Said letter is written on the letterhead of Defendant WEST PC and bears the signature of Defendant YOUNG.

12. On July 10, 2008, EXHIBIT A was mailed to Plaintiff by Defendants through the U.S. Postal Service, as set forth in "EXHIBIT B", annexed hereto and incorporated herein by reference as if fully rewritten.

13. The debt alleged to be owed by Plaintiff is a "consumer debt" as defined in the FDCPA.

14. Defendants, as debt collectors, are subject to all of the provisions of FDCPA.

15. Defendant's position as "debt collectors" is further set forth in the last paragraph of "EXHIBIT A", which states:

"This communication is from a debt collector. We are required to inform you that this is an attempt to collect a debt and any information obtained will be used for this purpose."

16. Further, Defendant WEST PC's status as a debt collector is further established by material published the internet web set of WEST PC, a portion of which, described as "Firm Overview", is set forth in "EXHIBIT C", annexed hereto and incorporated by reference as if fully rewritten. Such "Firm Overview" states, in part:

"Our collection managers have over 40 years combined experience in the industry and they, along with Mr. West, make sure that all employees follow the law of the United States and Texas"

17. Ohio law bars recovery of attorney fees in the course of collecting claims against consumers for unpaid credit card billings, as being against the public policy of this State.

18. The first paragraph of EXHIBIT A reads:

"Please be advised that since you have failed to resolve the above referenced matter to date, this law firm has been retained to review your account for potential litigation. Our client has asked us to inform you that a lawsuit filed against you may result in additional expenses for interest and court costs. ***Attorney's fees may also be sought.***" [Emphasis ours]

COUNT ONE

VIOLATION OF 15 U.S.C. §1692

19. Plaintiff incorporates the allegations, statements and averments of Paragraphs One through Eighteen as if fully rewritten herein.

20. Section 1692(e) of FDCPA generally prohibits a debt collector from using “[a]ny false, deceptive or misleading representation or means in connection with the collection of any debt.” More specifically, Section 1692(e) of the FDCPA prohibits Defendants from misrepresenting the character, amount or legal status of any debt.

21. By use of the statement “***Attorney’s fees may also be sought***” in EXHIBIT A, Defendants have violated Section 1692(e) of the FDCPA.

22. Further, Section 1692(f) of FDCPA prohibits a debt collector from using unfair or unconscionable means to collect or attempt to collect any debt. Included in the statute’s definition of “unfair practices” under this subsection is a prohibition on the “collection of and amount (including any interest, fee, charge or expense incidental to the principal obligation) unless such amount is expressly authorized by the agreement creating the debt or permitted by law.”

23. By use of the statement “***Attorney’s fees may also be sought***” in EXHIBIT A, Defendants have violated Section 1692(f) of the FDCPA.

24. Upon receiving EXHIBIT A, Plaintiff experienced extreme mental distress, loss of peace of mind, worry and anguish.

COUNT TWO PUNITIVE DAMAGES

25. Plaintiff incorporates the allegations, statements and averments of Paragraphs One through Twenty-Three as if fully rewritten herein.

26 Defendant, WEST PC, has heretofore been a Defendant in a series of actions arising out of the same modus operandi, with particular reference to averments that the creditor was entitled to recover attorney fees from the alleged obligors.

27. Defendant, YOUNG, has acted as attorney for Defendant, WEST PC, in at least one earlier action in this Court, to wit: Cherylette Belcher v. Law Offices of James A. West, P.C., et al., (Case No. 1:07-CV-3789 KMO), which litigation involved substantially the same facts as those in the present matter.

28. Defendants knew or should have known that Ohio law prohibits recovery of attorney fees from a debtor in a consumer action, but they have continued to make a representation that "**Attorney's fees may also be sought**", although such a claim is contrary to public policy in the State of Ohio.

29. Defendants' use of the statement, "**Attorney's fees may also be sought**", was intentional, malicious and reckless and was designed and intended to frighten the Plaintiff [and others similarly situated]. By virtue thereof, Plaintiff is entitled to recover punitive damages from the Defendants.

WHEREFORE, Plaintiff, prays for judgment as follows:

- I. Actual damages in an amount to be determined at trial;
- II. Statutory damages in an amount to be determined at trial;
- III. Punitive damages in an amount to be determined at trial;
- IV. Costs and attorney fees as provided by statute; and
- V. Such other and further relief as the Court determines to be just in the circumstances.

JURY DEMAND

Plaintiff demands a trial by jury.

/s/ HARVEY S. MORRISON
HARVEY S. MORRISON [#0015230]
Attorney for the Plaintiff
75 Public Square - Suite 1425
Cleveland, OH 44113-2070
PHONE: 216/687-0343
FACSIMILE 216/687-0323
EMAIL: harvmorr@aol.com

Law Offices of
JAMES A. WEST, P.C.
6380 Rogerdale Road, Suite 130
Houston, TX 77072-1624

(800) 568-4116
(713) 260-7627

July 09, 2008



Bonnie Dechant
159 Tamarack DR
Berea, OH 44017-1432



Reference: Capital One Bank (USA), N.A.
Account No: 4305722340066094
Current Balance: \$9733.71

Dear Bonnie Dechant:

Please be advised that since you have failed to resolve the above referenced matter to date, this law firm has been retained to review your account for potential litigation. Our client has asked us to inform you that a lawsuit filed against you may result in additional expenses for interest and court costs. Attorney's fees may also be sought.

Please note that as of the date of this letter, no decision has been made with regard to litigating your account. You may forestall any such potential action if you contact my office to discuss payment of your obligation. However, if we do not hear from you we will be forced to make this decision without any input from you. If a decision is made to proceed with litigation, your account will be forwarded to an attorney in your area for said action. Please call 800-568-4116 and ask for ELLERY GUILLORY at extension 1147.

~~Unless you notify this office within thirty (30) days after receiving this notice that you dispute the validity of this debt or any portion thereof, I will assume this debt to be valid. If you notify this office in writing within thirty (30) days of receipt of this notice, we will obtain verification of the debt and mail you a copy of such judgment or verification. If you request from this office in writing within thirty (30) days after receiving this notice, we will provide you with the name and address of the original creditor, if different from the current creditor.~~

This communication is from a debt collector. We are required to inform you that this is an attempt to collect a debt and any information obtained will be used for this purpose.

Sincerely,

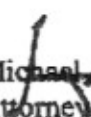

Michael J. Young
Attorney at Law

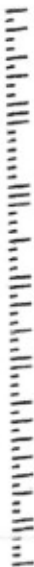
EXHIBIT A

RETURN SERVICE REQUESTED

LAW OFFICE OF
JAMIE A. WEST
A Professional Corporation
6500 ROXBOROUGH ROAD, SUITE 150
HOUSTON, TEXAS 77062


Bonnie Dechant
159 Tamarack DR
Berca, OH 44017-1432


FICW51 44017



042020074
2077054
07-10-2008
FIRST-CLASS MAIL
\$10.32
USPS
042020074
2077054
07-10-2008

EXHIBIT B

LAW OFFICES OF
JAMES A. WEST
A PROFESSIONAL CORPORATION

Saturday, July 19, 2008 ~ 5:49:59 PM

Menu[Home](#)[Firm Overview](#)[Practice Areas](#)[Attorney Profile](#)[Resource Links](#)[Court Reporters](#)[Email](#)[Judgment Collections](#)**Firm Overview**

The Law Offices of James A. West, P.C. is a full service lawfirm that can handle most any type of litigation. We represent clients ranging from individuals to multi-million dollar corporations, and all sizes of companies and individuals in between.

James A. West, P.C. has a complete collection division that is devoted to retail and business collections. Our strengths include our experienced staff and our quality control process. We have the best up to date computer abilities and extensive skip tracing databases as well as various methodologies that include segmentation by modeling and automated calling using these resources. Our niche is that not only can we collect accounts in the same manner as a regular collection agency, but with our litigation experience we review accounts to determine if the account is worth while to litigate, and follow through using all available means to collect on a judgment.

As previously stated, another feature of James A. West, P.C., is our experienced collection staff. Our average collector has 9.5 years experience in the collection industry and knows the laws relating to third party collections. Our collection managers have over 40 years combined experience in the industry and they, along with Mr. West, make sure that all employees follow the laws of the United States and Texas as well as the rules of James A. West, P.C. and all requirements of our clients.

Our number one rule is Always Be Polite. However, we do not shy away from any battle! For over 15 years the firm has been collecting debts for court reporters from attorneys as well as many other types of cases. Unfortunately, many of these required a lawsuit in order to collect the debt. We have been, and always are more than willing to go one on one with anyone to serve our clients interests, whether it is against attorneys, corporations or anyone else.

We have been very successful in collecting Judgments. While many firms will get a judgment and put it in a drawer hoping that someone will sell some property sometime, we aggressively search for assets and seek to collect the judgment for our client as soon as possible.

<http://www.jamesawestpc.com/firmover2.htm>

7/19/2008

James A. West, P.C. Home

Page 2 of 2

We are small enough to be flexible for our clients are do our best to prove the best customer service and legal advice as possible.